

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

October 18, 1999

U.S. Department of Agriculture  
Food Safety and Inspection Service  
Docket Number 98-045N

U.S. Department of Health and Human Services  
Centers for Disease Control and Prevention

U.S. Food and Drug Administration  
Docket Number 97N-0074

U.S. Environmental Protection Agency  
Docket Number OPP-00550B; FRL-6087-7

Ladies and Gentlemen:

Subject: President's Council on Food Safety, Notice of Meeting - Federal Register Vol. 64, No. 116,  
June 17, 1999

The Colorado Department of Public Health and Environment is sending this letter to register our support and submit comments regarding the national food safety strategic plan currently being developed by the President's Council on Food Safety. This Department believes it is very important that the strategic plan include state and local involvement in this most important federal interagency effort.

In May of 1997, the President's Food Safety Initiative (FSI) set the goal to apply the collective resources of government, industry, consumer and academia, to reduce, to the greatest extent possible, the incidence of foodborne illness. The FSI also called for collaboration between public and private organizations and better coordination within government agencies at the federal, state and local levels. On August 25, 1998, an executive order established the President's Council on Food Safety "in order to improve the safety of the food supply through science-based regulation and well-coordinated inspection, enforcement, research and education programs." Section 1 of this order establishes that, "the Council shall consult with other Federal agencies and State, local and tribal government agencies ....." Section 4 further elaborates these goals stating "All actions taken by the Council shall, as appropriate, promote partnerships and cooperation with States, tribes and other

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public and private sector efforts .....” In addition, the National Academy of Sciences report, “Ensuring Safe Food from Production to Consumption,” acknowledges that state and local agencies have major responsibilities and commitment of resources in delivering food safety activities in the United States. Similarly, it may be expected that federal agency decisions will have a major impact on state and local budgets and program activities.

This Department’s involvement with developing a shared vision to improve the integration of the U.S. food safety system and the means to make it work through a true partnership began at the 50 State Meeting in Kansas City in September of 1998. This three day meeting hosted by the U.S. Department of Health and Human Services, Food and Drug Administration, included representatives from the USDA, CDC, and state and local food safety regulation, laboratory and epidemiology officials. This effort was later titled the National Food Safety System initiative (NFSS). Further meetings, which included members of the EPA, established workgroups which have been developing specific project proposals to improve food safety nation wide. A coordinating committee composed of federal, state and local officials was formed to review the proposals and make suggestions for further action.

The NFSS initiative has facilitated better interstate and interagency cooperation, and it has served as a mechanism to develop specific project ideas and goals. Many of the NFSS’s proposed activities match closely with the President’s Council’s proposed goals and objectives for the current federal strategic plan initiative. Realizing this, we wish to propose the following specific comments:

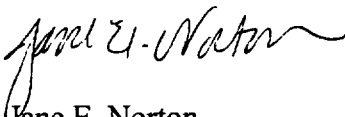
1. We support the current President’s Council interagency strategic planning process and the current goals and objectives as articulated in this docket.
2. We propose the establishment and maintenance of an ongoing mechanism for state and local involvement that coincides with the President’s Council federal strategic planning process. It is important that this occur during the formative stages of developing the federal plan related to state/local roles and responsibilities.
3. While the goals and objectives of the President’s Council are appropriately general at this time, we wish to encourage specific mention of laboratory capacity and information technology initiatives in future proposed goals.
4. We suggest that the docket remain open to provide further opportunities for comment by local and state food safety officials.

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In closing, we are pleased that the President's Council on Food Safety has begun this task. The NFSS initiative has been successful in bringing together for the first time local, state and national food safety officials to improve communication and to work on shared goals. As the President's Council reaches out to stakeholders for input, we wish to encourage you to build on the momentum generated by the state and local participation begun through the NFSS.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane E. Norton", with a stylized flourish at the end.

Jane E. Norton  
Executive Director  
Colorado Department of Public Health  
and Environment

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